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10 UNITED STATES OF AMERICA
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	Case No. 20-CR-00249 RS
14 Plaintiff,)	
15 v.)	APPLICATION OF THE UNITED STATES FOR
16 ROWLAND MARCUS ANDRADE,)	ORDER ISSUING FORFEITURE MONEY
17 Defendant.)	JUDGMENT
18)	

19 The United States of America, through the undersigned Assistant United States Attorney,
20 respectfully submits this Application of the United States for an Order Issuing a Forfeiture Money
21 Judgment. The defendant was sentenced over two days, commencing on July 29, 2025 and finalizing on
22 September 16, 2025. This application seeks the attached proposed order issuing the Forfeiture Money
23 Judgment.

24 **BACKGROUND**

25 On June 22, 2020, defendant Rowland Marcus Andrade, was charged by an Indictment with
26 violations of Title 18, United States Code, Section 1343 (Wire Fraud), Title 18, United States Code,
27 Section 2 (Aiding and Abetting), Title 18, United States Code, Section 1956(a)(1) (Money Laundering).
28 The Indictment sought criminal forfeiture pursuant to Title 18, United States Code, Sections

981(a)(1)(C), Title 28, United States Code, Sections 2461(c), and the procedures outlined in Rule 32.2 of the Federal Rules of Criminal Procedure. Dkt. 1.

On March 12, 2025, the jury returned guilty verdicts against Rowland Marcus Andrade, finding him guilty of Counts 1 and 2 charged in the Indictment. Dkt 615. On July 23, 2025, the United States filed a Motion for Forfeiture Money Judgment setting forth the factual and statutory basis for imposition of a forfeiture money judgement based upon the offenses of conviction. *See* Dkt. 711. On September 16, 2025, following a hearing focused on calculation of the amount of restitution and the amount of forfeiture, the Court issued an Order Granting in Part Request for Forfeiture and Restitution. Dkt. 740. The Court ordered “[t]he government’s request for a forfeiture money judgment is granted in the amount of \$8,374,609. *See* 18 U.S.C. § 981(a)(1)(C), 1956(c)(7), 1961(1); 28 U.S.C. § 2461(c); 21 U.S.C. § 853(p).” *Id.*

To meet the requirements of F.R.C.P. 32(b)(2)(A), the accompanying proposed order is sought which issues the Forfeiture Money Judgment and allows the government to seek satisfaction of the judgment from the defendant. Accordingly, the government respectfully requests the Court issue the accompanying Forfeiture Money Judgment order in the amount of \$8,374,609 against the defendant.

BASIS FOR ISSUING A FORFEITURE MONEY JUDGMENT

Rule 32.2 of the Federal Rules of Criminal Procedure addresses criminal forfeiture procedure. Rule 32.2(b)(1)(A) provides that as soon as practicable after entering a guilty verdict or accepting a plea of guilty or nolo contendere on any count in an indictment or information with regard to which criminal forfeiture is sought, a court shall determine what property is subject to forfeiture under the applicable statute. If the government seeks a personal forfeiture money judgment against the defendant, the court shall determine the amount of money that the defendant will be ordered to pay.

Rule 32.2(b)(1)(B) provides that a court's determination may be based on evidence already in the record.

Rule 32.2(b)(2) states that if a court finds that specific property is subject to forfeiture, it shall enter an order of forfeiture (deemed a preliminary order) that provides for an ancillary hearing to evaluate any claim by a third party to interest in the specific property. However, if the forfeiture

consists only of a money judgment – as here – no ancillary proceeding regarding third party rights is required, and thus only an order issuing the forfeiture money judgment is required. Rule 32(c)(1), (2).

Rule 32.2(b)(3) provides that the entry of the order authorizes the government to conduct any discovery a court considers proper in identifying, locating, or disposing of the property.

Based on the defendant's convictions of violations, the evidence in the record, and the arguments of counsel presented over two days of hearings, the Court determined that the requisite nexus had been established between the Forfeiture Money Judgment and the offenses of conviction, and issued the Order Granting in Part Request for Forfeiture and Restitution. Accordingly, the Forfeiture Money Judgment may and should be issued pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and the procedures outlined in Rule 32.2 of the Federal Rules of Criminal Procedure.

REQUEST FOR ORDER OF FORFEITURE


WHEREFORE, the United States respectfully requests that this Court issues the proposed Order issuing a Forfeiture Money Judgment which provides the following:

- a. Issuance of a Forfeiture Money Judgment against the defendant in the amount of \$8,374,609;
- b. authorizes the government to conduct discovery in order to identify, locate, or dispose of property to satisfy the Forfeiture Money Judgment, in accordance with Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure; and
- c. orders that the Court retains jurisdiction to enforce the Order of Forfeiture, and to amend it as necessary, pursuant to Federal Rule of Criminal Procedure 32.2(e).

Dated: September 24, 2025

Respectfully submitted,

CRAIG H. MISSAKIAN
United States Attorney


KAREN BEAUSEY
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she caused a copy of the following documents:

- **APPLICATION OF THE UNITED STATES FOR ORDER ISSUING FORFEITURE MONEY JUDGMENT**
- **[PROPOSED] ORDER ISSUING FORFEITURE MONEY JUDGMENT**

to be served this date by CM/ECF Electronic Case Filing Notification upon the person below at the place and address which is the last known address:

Michael J. Shepard 50 California Street, Suite 330 San Francisco, CA 94111 Attorney for Rowland Marcus Andrade	Cindy A. Diamond 58 West Portal Avenue, #350 San Francisco, CA 94127 Attorney for Rowland Marcus Andrade
Dainec Stefan King & Spalding, LLP 1185 6 th Avenue, 34 th floor New York, NY 10036 Attorney for Rowland Marcus Andrade	

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 24th day of September 2025 at San Francisco, California.

/S/
CAROLYN JUSAY
FSA Paralegal
Asset Forfeiture Unit